



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

June 1, 2001

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Bud Smith  
Manager, Environmental Control  
Wheeling Pittsburgh Steel Corporation  
1134 Market Street  
Wheeling, West Virginia 26003-2971

JUN 01 2001

Re: RFI Workplan

Dear Mr. Smith:

This letter is in response to your letter of November 4, 1999 submitting the above referenced report. EPA granted WPSC conditional approval for the installation of 15 wells located along Battery Road in Sector B on January 5, 2000.

This work plan recognizes that a second phase of investigation may be necessary based on the results of the first phase. The proposed work for Phase 1 should give an adequate snapshot of environmental conditions at the facility on which to base the decision on what work should be conducted during the subsequent phase.

EPA has completed its review of the RFI Workplan. The following comments must be addressed:

1. The workplan is labeled "Privileged & Confidential Attorney-Client Communication". This document is a detailed plan that Wheeling Pitt will follow throughout the RFI that will lead to characterization of the nature, extent, and rate of migration of a release of hazardous waste or hazardous constituents. Ultimately the work outlined in this report will be the basis for any Final Decision EPA may make with regard to remediation necessary at Wheeling Pitt. For these reasons, this document will become part of the Administrative Record which is a public document. The phrase "Privileged & Confidential Attorney-Client Communication" must be removed from the workplan.
2. Since the contractor implementing the work plan is different than the contractor who prepared the work plan, please verify that the SOPs are correct for the field equipment to be used.
3. Page 1-42, Section 1.8.2.1 Subtask 2.1 - Geoprobe Soil Borings/Groundwater Samples - This section indicates that there are two Geoprobe locations on Sector D, but only one location is shown on Figure 5.

4. Page 1-46, Section 1.8.2.6, Subtask 2.6 - Survey Wells and Mahans Run - Will surveying be referenced to the State Plane Coordinate system? Will Geoprobe, soil gas, and surface soil sampling locations also be surveyed? Will existing wells be resurveyed? This section indicates that three locations along Mahan's run will be surveyed. There are 2 Ohio River measuring points identified on Figure 5. Will these be surveyed?
5. Page 1-47, Section 1.8.2.7, Subtask 2.7 - Water Level Measurements - This section should also indicate that water levels at the three staff gages in Mahan's run and the two Ohio River gages will be measured at the same time as the groundwater level measurements.
6. Page 1-47, Section 1.8.2.8, Subtask 2.8 - Well Evaluation/Development - Please indicate that turbidity will be measured with a turbidity meter.
7. Page 1-50, Section 1.8.2.12, Subtask 2.12 - Slug Testing - Recommend that all new wells be slug tested.
8. Page 1-72, Section 1.9.1, Site Management - The text states that no field work will be performed at least 24 hour notice is given to the USEPA RPM. Section XB of the Administrative Order states in part that, "Respondent shall notify EPA, in writing, at least fourteen (14) calendar days in advance of any field activities, including but not limited to, well drilling, installation of equipment, or sampling." This Section should be modified to reflect this requirement.
9. Page 1-72, Section 1.9.2, Project management Structure - This section needs to be revised to reflect the new contractor.
10. Page 2-20, Section 2.4.3.3.2 HSA Soil Sampling - The work plan indicates that soil sampling will be conducted at two and perhaps three depths for the perched zone wells, but no soil analytical sampling will be conducted at greater depths. The aquiclude/aquitard is a fine-grained unit that may be a reservoir for significant contaminant mass and may be a controlling factor for groundwater quality in the underlying alluvial aquifer. Soil sampling in the aquiclude/aquitard unit should also be considered.
11. Page 2-23, Section 2.4.3.3.3.1 (Perched Aquifer Zone Wells) and Section 2.4.3.3.3.2 (Upper and Lower Alluvial Aquifer Zone Wells) - These sections both reference a Section 2.1.1.1.3.3 which does not exist. The correct reference is probably Section 2.4.3.3.3.3 (Monitoring Well Construction).
12. Page 2-29, Section 2.4.3.11, Water Level Measurements - This section indicates that an electronic water level indicator will be used, and possibly a hydrocarbon interface probe if necessary. Appendix E (Standard Operating Procedures) does not contain an SOP for either of these.

WPSC has thirty (30) calendar days to respond to this letter with a revised RFI Workplan in accordance with the Final Administrative Order. Should you have any questions concerning the above comments please feel free to contact me at 215-814-3433.

Sincerely,

A handwritten signature in cursive script that reads "Estena A. McGhee".

Estena A. McGhee  
Environmental Engineer

cc: Robert Greaves, 3WC23  
Joel Hennessy, 3WC11  
Betty Anne Quinn, 3WC11  
H. Michael Dorsey, WVDEP

